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April 13, 2024

BY ECF

The Honorable Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: *United States v. Eric Rodriguez, 20 Cr. 77 (SHS)*

Dear Judge Stein:

I represent Eric Rodriguez in the above-referenced § 2255 motion. I write to respectfully request permission to file a late response, upon receipt of the defendant's signed declaration. On February 28, 2024, after having graciously granted several previous defense requests, the Court granted a final extension of time until April 12, 2024, with no further extensions. Unfortunately, through no fault of his own, I have not yet received a signed declaration from Mr. Rodriguez. Consequently, I was unable to file a response yesterday, and I take full responsibility for the delay, with apologies to the Court and the government. If the Court would permit, I am prepared to file upon receipt of the signed declaration, as I am aware that it has been received at FCI Allenwood (Mr. Rodriguez never received the copy I mailed previously). We thank the Court for its time and consideration of this matter.

Respectfully submitted,



Michael D. Bradley

cc: AUSA Thomas Burnett (*via ECF*)

Request granted. The defense has until May 6 to file its response.

Dated: New York, New York
April 15, 2024

SO ORDERED:



Sidney H. Stein, U.S.D.J.